

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:

CASE NO.: 23-40605-ELM-13

DENNIS RAYMOND HANEY

517 CASSIA WAY  
ARLINGTON, TX 76002  
SSN/TIN: XXX-XX-5915

DEBTOR

HEARING: JULY 6, 2023 AT 8:30 AM

**TRUSTEE'S MOTION TO DISMISS CASE FOR CAUSE AND NOTICE OF HEARING**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

NOW COMES Pam Bassel Standing Chapter 13 Trustee and files this Trustee's Motion to Dismiss Case for Cause under 11 U.S.C. § 1307 and Fed. R. Bank. P. 9014. Trustee would respectfully show the Court:

1. The Court has jurisdiction, and this is a core proceeding.<sup>1</sup>
2. This case should be dismissed under § 1307 because the delay in confirming Debtor's Chapter 13 Plan is unreasonable and prejudicial to creditors.

WHEREFORE, Trustee prays that Trustee's Motion to Dismiss Case for Cause be GRANTED and for general relief

Respectfully submitted,

By: /s/ Ethan S. Cartwright  
Ethan S. Cartwright, Staff Attorney  
Bar No. 24068273  
PAM BASSEL STANDING CHAPTER 13 TRUSTEE  
Bar No. 01344800  
860 Airport Freeway, Ste 150  
Hurst, TX 76054  
(817) 916-4710 Phone

<sup>1</sup> 11 U.S.C. § 105 & 28 U.S.C. §§ 157(b) & 1334

This matter will be called at the docket call on the date and time above in Room 204 at Eldon B. Mahon U.S. Courthouse 501 W. 10th St., Fort Worth, Tx 76102-3643 with a hearing following docket call. YOU DO NOT HAVE TO ATTEND THE HEARING UNLESS YOU OPPOSE DISMISSAL OF THE CASE.

By: /s/ Ethan S. Cartwright  
Ethan S. Cartwright

**CERTIFICATE OF SERVICE**

I certify that a true and copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtor's attorney and all parties entitled to electronic notice and by first class mail on the Debtor and the parties listed below, if any.

By: /s/ Ethan S. Cartwright  
Ethan S. Cartwright

DENNIS RAYMOND HANEY  
517 CASSIA WAY  
ARLINGTON, TX 76002